

IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE MIDDLE DISTRICT OF ALABAMA  
SOUTHERN DIVISION

HUBERT JONES, )  
PLAINTIFF, )  
V. ) CIVIL ACTION NO: 1:05CV-612-MHT

DAVID JONES; MIKE SHAD CHRYSLER  
P/J/E; DAIMLERCHRYSLER SERVICES OF NORTH  
AMERICA, LLC; EQUIFAX INFORMATION  
SERVICES, LLC; TRANSUNION; EXPERIAN;  
CORNELIUS JENKINS, INDIVIDUALLY; CORNELIUS  
JENKINS, AS AGENT FOR MIKE SHAD CHRYSLER P/J/E;  
CORNELIUS JENKINS AS AGENT FOR DAIMLERCHRYSLER  
SERVICES OF NORTH AMERICA LLC;  
and  
A-Z, being persons, partnerships or corporations  
names that are otherwise unknown but will be  
added be amendment when ascertained,  
DEFENDANTS.

**MOTION BY PLAINTIFF FOR LEAVE TO AMEND COMPLAINT**

Plaintiff moves the court for an order allowing the Plaintiff to amend the Complaint filed heretofore to reflect the proper names of the Defendants in this action. The Amended Complaint should reflect any and all references to all parties in the following manner:

1. Defendant, Mike Shad Chrysler P/J/E, should hereinafter be known as “Mike Shad Chrysler Jeep, Inc.” and any and all references to Mike Shad Chrysler P/J/E in the Amended Complaint as filed shall be directed to Mike Shad Chrysler Jeep, Inc.
2. Defendant, Transunion, should hereinafter be known as “Trans Union, LLC” and any and all references to Transunion in the Amended Complaint as filed shall be directed to “Trans Union, LLC”.

3. Defendant, Equifax Information Services, LLC, should hereinafter be known as “Equifax Information Services, Inc.” and any and all references to Equifax Information Services, LLC in the Amended Complaint as filed shall be directed to “Equifax Information Services, Inc”.
4. Defendant, Experian, should hereinafter be known as “Experian Information Solutions, Inc.” and any and all references to Experian in the Amended Complaint as filed shall be directed to Experian Information Solutions, Inc.”.
5. Defendant, DaimlerChrysler Services North America LLC, should hereinafter be known as DaimlerChrysler Financial Services Americas LLC f/k/a DaimlerChrysler Services North America LLC and any and all references to DaimlerChrysler Services North America LLC in the Amended Complaint as filed shall be directed to DaimlerChrysler Financial Services Americas LLC f/k/a DaimlerChrysler Services North America LLC.

Wherefore, Plaintiff prays this Honorable Court will allow the Complaint as amended to reflect the proper names of the Defendants in this cause.

Respectfully submitted this the 29st day of September, 2006.

s/Donna C. Crooks  
DONNA C. CROOKS (CRO-056)  
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### **CERTIFICATE OF SERVICE**

This is to certify that on the 29th day of September, 2006, a true and correct copy of the above and foregoing document has been electronically filed with the foregoing Clerk of the Court using the CM/ECF system which will send notification of such filing to the following counsel and/or a copy is mailed via U.S. Mail, postage prepaid and properly addressed to those individuals who are non-CM/ECF participants:

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